

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re the Application of NATALIA
POTANINA

For an Order to Take Discovery Pursuant
to 28 U.S.C. § 1782(a)

Misc. Action No. 14 MC 0031 (JGR)

APPLICATION FOR DISCOVERY UNDER 28 U.S.C. § 1782

Applicant Natalia Potanina has been sued for divorce in the Presnensky District Magistrate Court in Moscow, Russia (the “Moscow Court”). Mrs. Potanina has initiated this Miscellaneous Proceeding in the Southern District of New York for purposes of filing this Application, which seeks an *ex parte* Order pursuant to 28 U.S.C. § 1782, authorizing the issuance and service of subpoenas *ad testificandum* and *duces tecum*. Mrs. Potanina seeks this Application so that Mrs. Potanina may depose and serve document requests upon companies and individuals who have their offices and residences in the Southern District of New York to obtain discovery regarding marital assets for potential use in the aforementioned divorce action.

In support of her Application, Mrs. Potanina relies on: (i) the Memorandum of Law filed concurrently herewith; (ii) the Declaration of Natalia Potanina in Support of Application under 28 U.S.C. § 1782(a); (iii) the Declaration of Karl Geercken in support of such application, and (iv) the Declaration of Larisa Ryabchenko of the Bar of Russia in support of such application (attached as Exhibit “A” to the Declaration of Karl Geercken).

For the reasons sets forth more fully therein, Mrs. Potanina respectfully requests that this Court enter the Proposed Order attached hereto as Exhibit "A," authorizing this discovery to be conducted.

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